



*United States Attorney  
Eastern District of New York*

CP  
F.#2010R00420

*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 13, 2012

**VIA HAND DELIVERY**

Susan R. Necheles, Esq.  
500 Fifth Avenue  
29th Floor  
New York, NY 10110

Russell M. Gioiella, Esq.  
140 Broadway  
38th Floor  
New York, New York 10005

Re: United States v. Pedro Espada Jr., et al.  
Criminal Docket No. 10-985 (FB)

Dear Counsel:

Please find enclosed a disc containing the following:

- (a) An updated, draft exhibit list.
- (b) A set of all exhibits set forth on the updated, draft exhibit list, with the exception of GX 128 (HSBC records for Soundview), which was provided to you previously as Rule 16 discovery in January 2011. We are in the process of having GX 128 bates-stamped and scanned.
- (c) A draft list of materials being provided pursuant to 18 U.S.C. § 3500.
- (d) The materials set forth on the draft § 3500 list.

The government reserves the right to offer additional exhibits and witnesses at trial, in addition to those on the draft exhibit and § 3500 lists being provided to you today.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/  
Carolyn Pokorny  
Assistant U.S. Attorney

Clerk of the Court (FB)(w/o enclosures)



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